



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-3912

Refer to: L1631210003 -- St. Clair County
Monsanto Landfill (Site R) - Sauget
Superfund/Technical Reports

January 8, 1997

Mr. Steven D. Smith
Manager, Remedial Projects
Monsanto Chemical Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63137

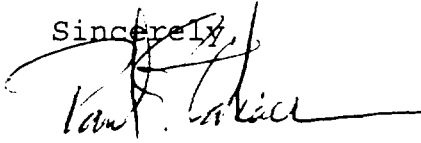
Dear Steve:

As you will recall, the Illinois EPA met several times with Monsanto to discuss the possibility of removing Site R from the Illinois EPA's proposal for listing on the NPL in exchange for a firm commitment by Monsanto, embodied in a negotiated consent order, to implement the directed remedy after completion and approval of the RI/FS. The Illinois EPA can support this type of agreement, and can commit to continue discussions leading to an agreement to forgo a Site R listing to the NPL in exchange for Monsanto's agreement to perform the chosen remedy based on a completed and approved RI/FS which is anticipated to include leachate controls (i.e. through horizontal well installations), extension of the existing landfill cap and future deed restrictions at Site R.

As you are also aware, Monsanto has not fully satisfied the requirements for the RI/FS, data needs, and the Risk Assessment set forth in the consent order entered on February 13, 1993 in People v. Monsanto, 82-CH-195. At our August 6 and November 20 meetings, I outlined data gaps in the RI/FS that remain outstanding. These include, but may not be limited to, a more thorough investigation (e.g. additional soil borings) in the areas adjacent to the landfill so that it can be determined how far the landfill cap should be extended. Additionally, the Risk Assessment must address how leachate from Site R is impacting the Mississippi River. It may be possible to address these deficiencies if Monsanto performs a remedy approved by the State that accounts for these gaps and if Monsanto performs a qualitative study, subject to State approval, that will address potential exposures to site-related leachate under the "no action alternative". However, this issue will require further discussion prior to its resolution.

Please call me if you have questions or concerns about this letter or the Illinois EPA's proposal in general.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul E. Takács", written over the word "Sincerely,".

Paul E. Takács, Project Manager
National Priorities Unit
Division of Remediation Management
Bureau of Land

cc: Terry Ayers
Larry Eastep
Todd Rettig
Jim Morgan, IAGO
Tom Martin, USEPA
Leah Evison, USEPA
Richard Burke, Eagle Marine
Division File